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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ERIN ALLEN,

Plaintiff,

vs.

VOCATUS, LLC, a Nevada Limited Liability  
Company; SHAMOUN'S, LLC, a Nevada  
Limited Liability Company; and DOES and  
ROE entities I – X, inclusive,

Defendants.

Case No. 2:21-cv-00377-APG-EJY

**STIPULATION AND [PROPOSED]  
ORDER TO STAY ACTION PENDING  
MEDIATION**

Pursuant to Local Rules ("LR") IA 6-2 and LR 7-1, Defendants Vocatus, LLC and Shamoun's, LLC (collectively, "Defendants") and Plaintiff Erin Allen ("Plaintiff"), by and through undersigned counsel, hereby request and stipulate to stay the entire action in the above-captioned matter pending mediation.

The purpose of the stay is to promote judicial economy and allow this court to more effectively control the disposition of the cases on its docket with economy of time and effort for itself, for counsel, and the litigants. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (U.S. 1936) ("[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and

for litigants.”); *Pate v. DePay Orthopedics, Inc.*, 2012 WL 3532780, at \* 2 (D. Nev. Aug. 14, 2012) (“A trial court may, with propriety, find it is efficient for its own docket and the fairest course for the parties to enter a stay of an action before it, pending resolution of independent proceedings which bear upon the case.”), citing *Leyva v. Certified Grocers of Cal., Ltd.*, 593 F.2d 857, 863 (9th Cir. 1979).

Plaintiff filed a Motion for Settlement Conference (“Motion”) on October 26, 2021. (ECF No. 18.) Defendants filed a Notice of Non-Opposition to Plaintiff’s Motion on November 5, 2021. (ECF No. 19.) The Court granted Plaintiff’s Motion on November 8, 2021. (ECF No. 20.) A Settlement Conference is currently set for December 14, 2021. (ECF No. 21.) Should the parties be unsuccessful at resolving this matter, the parties shall meet and confer to prepare an updated Discovery Plan and Scheduling Order to address the remaining limited discovery that needs to be completed, dispositive motions, and pre-trial deadlines.

This Stipulation is made in good faith and not for the purposes of undue burden or delay.

DATED this 10th day of November, 2021. DATED this 10th day of November, 2021.

HATFIELD & ASSOCIATES, LTD.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.

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/s/ Amy L. Howard

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### **ORDER**

IT IS SO ORDERED.

  
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U.S. DISTRICT JUDGE

\_\_\_\_\_  
November 12, 2021  
DATE